

NO. 81636-1

SUPREME COURT
OF THE STATE OF WASHINGTON

PAUL LAWSON,

Petitioner,

vs.

CITY OF PASCO, a municipal corporation,

Respondent.

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SUPREME COURT
STATE OF WASHINGTON

LAWSON'S ANSWER TO AMICUS CURIAE BRIEF
OF MANUFACTURED/MOBILE HOME OWNERS OF AMERICA

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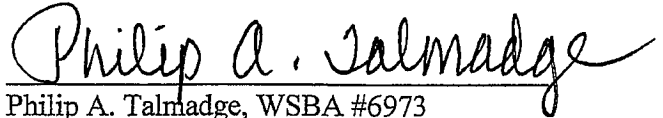
RCW 59.20	1
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Petitioner Paul Lawson received the amicus curiae brief of Manufactured/Mobile Home Owners of America ("MHOA"). The MHOA brief confirms the public policy arguments advanced in Lawson's supplemental brief at 15-16 and 17. The Pasco ordinance at issue in this case will result in the eviction of mobile home tenants, contrary to the policy of the Mobile Home Landlord Tenant Act, RCW 59.20. The ordinance flies in the face of the legislative policy of preserving housing for low income people like the persons residing in their recreational vehicles in this case. The MHOA brief indicates that both mobile home landlords and tenants, who are often at odds, are in agreement that Pasco's ordinance should not stand.

The MHOA brief supports Lawson's contention that this Court should reverse the decision of the Court of Appeals and reinstate the trial court's decision invalidating Pasco's ordinance which banned tenants from occupying recreational vehicles as primary residences in mobile home parks. Moreover, Lawson should recover his reasonable attorney fees at trial and on appeal.

DATED this 11th day of September, 2009.

Respectfully submitted,

A handwritten signature in cursive script that reads "Philip A. Talmadge". The signature is written in dark ink and is positioned above the printed contact information.

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DECLARATION OF SERVICE

On this day said forth below, I emailed and deposited with the U.S. Postal Service a true and accurate copy of: Lawson's Answer to Amicus Curiae Brief of Manufactured/Mobile Home Owners of America in Supreme Court Cause No. 81636-1 to the following parties:

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Washington Supreme Court
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I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: September 11, 2009 at Tukwila, Washington.


Paula Chapler, Legal Assistant
Talmadge/Fitzpatrick